

Mail Complete Application to:

Wisconsin Department of Natural Resources
Permits Section-WQ/3
PO Box 7921
Madison, WI 53707-7921

**Phosphorus Multi-Discharger
Variance Application for Municipal
Facilities - s. 283.16, Wis. Stats.**

Form 3200-150 (R 03/17)

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Notice: Pursuant to s. 283.16, Wis. Stats, an owner of an existing permitted wastewater treatment system may apply for a variance to a phosphorus water quality based effluent limits (WQBEL). Complete this form and submit to the Department of Natural Resources (DNR) to request coverage under the multi-discharger variance (MDV) for phosphorus. Personal information collected will be used for administrative purposes and may be provided to requestors to the extent required by Wisconsin's Open Records law [ss. 19.31-19.39, Wis. Stats.]

Facility and Permit Information				Facility Contact Information			
WPDES Permit No.				Contact Name			
WI- 0 0 2 1 7 3 3				Adam Gitter			
Facility Name				Title			
Kewaskum WWTP				Village Administrator			
Facility Street Address				Address			
1000 Fond du Lac Ave				204 1st St			
City		State	ZIP Code	City		State	ZIP Code
Kewaskum		WI	53040	Kewaskum		WI	53040
Receiving Water		County		Phone No. (incl. area code)		Fax Number	
Milwaukee River		Washington		(262) 626-8484			
Source of Water Supply		Average Discharge Flow Rate		Email Address			
Groundwater		0.5 MGD		adam.gitter@village.kewaskum.wi.us			

Variance Request Schedule	Check all that apply:
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- This variance is being requested at the time of application for permit reissuance pursuant to s. 283.16(4)(b)1, Wis. Stat. ☒
- This variance is being requested within 60 days after the department reissues or modifies the permit to include a phosphorus WQBEL pursuant to s. 283.16(4)(b)2, Wis. Stat. ☐
- This variance is being requested from a current WPDES Permit pursuant to 283.16(4)(b)3, Wis. Stat. ☐

Date of Current Permit Issuance: _____

Note: WPDES permit must be issued prior to April 2014.

4. Has the MDV been included in previously issued WPDES Permits?

Yes ☐

How many permits has the MDV been approved for? _____

No ☒

Variance Requirements

5. Has this point source discharge been authorized by a WPDES permit prior to December 1, 2010? ☒ Yes

~~Note: If no, you are ineligible for the MDV in accordance with s. 283.16(4), Wis. Stat. STOP~~ ☐ No

6. Has this point source relocated its outfall location since December 1, 2010? ☐ Yes

☒ No

7. Is the point source located in an eligible MDV county as specified in Appendix H of the MDV Implementation Guidance? ☒ Yes

☐ No

Note: If no, you are ineligible for the MDV in accordance with s. 283.16(4), Wis. Stat.

WPDES Permit No.

WI- 010121171313

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8. Does this limit require a major facility upgrade in order to achieve compliance?

☒ Yes

☐ No

Justify:

The currently optimized facility is only able to achieve between 0.3 and 0.4 mg/L effluent TP, and also struggles seasonally with effluent TSS compliance which inhibits TP removal. Effluent filtration will be required to ensure compliance with both future TSS and TP TMDL-based limits.

Note: If no, you are ineligible for the MDV in accordance with s. 283.16(4), Wis. Stat. STOP. A major facility upgrade means that a facility needs to install new equipment and a new process such as installing filtration or equivalent technology.

9. Phosphorus Water Quality-Based Effluent Limitation from which variance is sought:

☐ Concentration-based WQBEL pursuant to s. NR 217.13, Wis. Adm. Code

☒ TMDL mass-based WQBEL pursuant to s. NR 217.16, Wis. Adm. Code

Check all months for which variance is requested:

☒ All months

☐ Jan ☐ Apr ☐ Jul ☐ Oct
☐ Feb ☐ May ☐ Aug ☐ Nov
☐ Mar ☐ Jun ☐ Sep ☐ Dec

10. Do you believe these limits could be achieved during the term of the permit?

☐ Yes

☒ No

11. Current effluent quality

Note: Use 30-day P99 if 11 or more representative effluent samples are present. Only include effluent data for those outfall(s) a variance is being requested for.

Outfall Number(s)	Conc. (mg/L)	Number of Samples Results Used	Sample Time Period Used	
1	0.43	644	01/01/2018	12/31/2020

12. Are applicable phosphorus limits currently effective in the WPDES permit more restrictive than 1 mg/L?

☒ Yes

☐ No

Facility Information (provide attachments as necessary)

13. What are the average phosphorus levels within your influent TP concentration? 6 mg/L

14. Has the treatment process at the facility been optimized to maximize its phosphorus removal capabilities?

☐ Yes

Completion date: _____

☒ No, but in process of completing

☐ No, not yet started

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15. Has a facility planning or evaluation study for phosphorus been approved by the Department?

☐ Yes

Approval date: _____

☒ No, but in process of completing

☐ No, not yet started

16. Briefly describe the technology that would need to be added to comply with phosphorus limits in your permit:
Tertiary Filtration consisting of either a cloth media disc filter, or sand filter equipped with dedicated rapid mix and flocculation will be required to consistently comply with future TP and TSS limits based on the Milwaukee River TMDL.

Attach any new or additional information that you would like to provide the Department regarding optimization measures and/or compliance alternatives planning efforts.

Projected Compliance Costs

17. What is the projected net present value cost for complying with the phosphorus WQBELs? \$ 5,961,000

Source of cost projection:

Final Compliance Alternatives Plan anticipated to be submitted to WDNR by October 15, 2021.

Note: If a facility uses projected compliance costs provided in the Economic Impacts Analysis, they must certify that these costs are reasonable for the facility in question. See "projected compliance costs" in Section 2.02 of the MDV Implementation Guidance for details.

18. Has the feasibility of water quality trading or adaptive management been evaluated for the facility? ☒ Yes

☐ No

19. Is the facility eligible for adaptive management or water quality trading? ☒ Yes

☐ No

20. What is the needed offset to comply with AM/WQT?

757 lbs/year

☐ Unknown at this time

21. Is adaptive management or water quality trading a viable compliance option?

☐ Yes

☒ No

Describe:

The total annual offsets would require a significant amount of acreage in the upstream agricultural community to generate sufficient credits, and the Village has limited resources with which to effectively manage a program of this size. The Village may re-evaluate WQT at a later date.

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Service Area Information- Provide the following information for each municipality included in the wastewater facility service area.

Municipality Name	County	Population Served	Customer Households Served	Median Household Income (MHI)
Village of Kewaskum	Washington	4,000	1,520	\$62,685.00

Non-Residential Customers:

Percent of wastewater flow attributed to commercial industrial, large institutional and any other special customer category:

27 %

Describe types of non-domestic wastewater contributions that constitute a significant phosphorus contribution or that significantly affect the capabilities of the treatment facility. Examples include: large food processors, dairies, or industries with unique wastewater.

Dairy and Meat Market

Affordability to Municipal Dischargers

22. What is the projected household user charge, expressed as a percent of MHI, once phosphorus compliance costs are factored in?

1.2 %

Attach supporting information on a separate attachment to this form. The applicant may also provide additional information on impacts to commercial, industrial, or other special customers or any other information regarding affordability.

23. What is the secondary indicator score for the county (counties) in which the service area is located in?

3

Note: See Appendix A of the MDV Implementation Guidance for details.

If the service area is located in multiple counties, provide the weighted average value.

Watershed Project. Select one of the following watershed project options:

Option A. County payment contribution



Option B. Binding, written agreement with the DNR to construct a project or implement a watershed plan.



Submit Form 3200-148 with MDV application

Option C. Binding, written agreement with another entity that is approved by the DNR to construct a project or implement a watershed plan.



Submit Form 3200-148 with MDV application.

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Certification

Based on the information provided, I believe that my permitted facility qualifies for coverage under the multi-discharger phosphorus variance based on the requirements of s. Wis. Stat. 283.16 (4), Wis. Stat. I understand that as a condition of the variance, the Department will impose interim limitations and require a watershed project or plan to be completed as part of the phosphorus reduction measures for phosphorus during the term of the variance in accordance with s. Wis. Stat. 283.16(6). I understand that these conditions will be included in the WPDES permit issued to this facility and I agree to comply with all applicable permit conditions for this variance. I hereby certify that the determination in Wis. Stat. 283.16(2)(a) applies to my permitted facility and that my permitted facility cannot otherwise comply with its phosphorus water quality based effluent limitations without a major facility upgrade. To the best of my knowledge, the information in this application is true, accurate, and complete.

Print or type name of person submitting request (Individual must be an Authorized Representative)	Title
Adam Gitter	Village Administrator
Signature of Official 	Date Signed 9/29/2021